



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

GMP:BCR
F. #2009R01065

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 18, 2019

By ECF

The Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Joaquin Archivaldo Guzman Loera
Criminal Docket No. 09-466 (S-4) (BMC)

Dear Judge Cogan:

In the Court's order adopting the parties' joint proposal for review of sealed and redacted documents entered on the docket in this case, the Court ordered the parties to review, within 30 days following the entry of a verdict, filings made under seal since October 1, 2018 in order to determine whether those documents could be unsealed. See Dkt. No. 557.

On March 14, 2019, the government filed a letter with the Court articulating its position with respect to unsealing as to the government's sealed and redacted filings made since October 1, 2018. See Dkt. No. 587. The government provided its proposal to the defense prior to filing its letter.

On March 15, 2019, the defense provided the government with a list of documents that it proposes to ask the Court to unseal. In order to determine whether it has any objections to the defendant's proposal, including whether there is a basis for the continued sealing or partial redaction of filings identified by the defendant, the government respectfully requests until Thursday, March 21, 2019, to review the defendant's proposal and the documents identified therein. On or before that date, the government will file a letter informing the Court whether it agrees with the defendant's unsealing proposal. If the government has

any objections to the defendant's proposal to unseal particular docket entries, it will provide the basis for those objections in its letter.

Respectfully submitted,

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cc: Clerk of Court (BMC) (via ECF)
Defense Counsel (via Email)